

REGINA TAYLOR, Individually and as )  
 Administratrix of the Estate of Larry S. )  
 Taylor, )  
 )  
 Plaintiff, ) No. \_\_\_\_\_  
 )  
 v. )  
 )  
 AMERICAN INTERNATIONAL GROUP, )  
 INC. (AIG) and/or d/b/a CHARTIS )  
 INSURANCE, )  
 )  
 Defendant. )

Pursuant to 28 U.S.C. §§ 1331, 1441 and 1446, Defendant American General Life Insurance Company (“AGLIC”), incorrectly identified in the Complaint as “American International Group, Inc. and/or Chartis Insurance”, hereby removes this case to this Court from the Circuit Court for Giles County, Tennessee, and states as follows:

4. Under applicable law, any and all of Plaintiff's claims are preempted by ERISA. Therefore, Plaintiff's claims present a question of federal law, invoking this Court's jurisdiction under 28 U.S.C. § 1331.

5. AGLIC is filing with the Circuit Court for Giles County a notice of the filing of this Notice of Removal.

WHEREFORE, AGLIC gives notice of the removal of this action to this Court and prays that any further proceedings in the Circuit Court for Giles County be halted.

Respectfully submitted,

/s/ David L. Johnson  
David L. Johnson (#18732)  
BUTLER, SNOW, O'MARA, STEVENS &  
CANNADA PLLC  
The Pinnacle at Symphony Place  
150 Third Avenue South, Suite 1600  
Nashville, TN 37201  
(615) 651-6700  
(fax) (615) 651-6701  
[David.johnson@butlersnow.com](mailto:David.johnson@butlersnow.com)

*Attorneys for Defendant*

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served via the U.S. District Court's ECF filing system and via U.S. Mail, postage prepaid, upon the following:

Ben Boston  
Charles W. Holt, Jr.  
Ryan Durham  
BOSTON, HOLT, SOCKWELL & DURHAM, PLLC  
235 Waterloo Street, P. O. Box 357  
Lawrenceburg, TN 38464

this 11<sup>th</sup> day of June, 2013.

/s/ David L. Johnson  
David L. Johnson

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